

1 THE HONORABLE ROBERT J. BRYAN
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

10 HANA ETCHEVERRY, Individually and On
11 Behalf of All Others Similarly Situated,

Plaintiff,

v.

12 FRANCISCAN HEALTH SYSTEM D/B/A
13 CHI FRANCISCAN HEALTH,
14 FRANCISCAN MEDICAL GROUP,
15 FRANCISCAN HEALTH VENTURES,
16 HARRISON MEDICAL CENTER, and
HARRISON MEDICAL CENTER
FOUNDATION.

Case No. 3:19-cv-05261-RJB-MAT

**JOINT NOTICE OF COLLECTIVE AND
CLASS ACTION SETTLEMENT**

17 Defendants.

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

Plaintiff in the above-captioned action and Defendants, through their respective counsel of record, hereby notify the Court that, on or about January 29, 2021, the parties reached agreement on the terms of a collective- and class-wide settlement that, once approved by the Court, will resolve the above-captioned action in its entirety. The Parties are currently drafting the settlement papers, and Plaintiff anticipates filing a motion for preliminary approval, together with supporting documentation, within sixty (60) calendar days.

Accordingly, the Parties provide notice of settlement and respectfully request the Court remove all upcoming deadlines in the current scheduling order while the Parties consummate and finalize the settlement approval papers.

RESPECTFULLY SUBMITTED AND DATED this 22nd day of February, 2021.

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5 *Attorneys for Plaintiff, Class, and Collective*

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7 **CERTIFICATE OF SERVICE**

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10 I hereby certify that on February 22, 2021, a true and accurate copy of the foregoing was
11 electronically filed with the Clerk of Court using the CM/ECF system, which will automatically
12 send email notification of such filing to all counsel of record.

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28 */s/ Carolyn H. Cottrell*
Carolyn H. Cottrell